Before the

Federal Communications Commission

Washington, D.C. 20554

In the Matter of) MM Docket No. 95-32) RM-8545	
Amendment of Section 73.202(b) (Table of Allotments) FM Broadcast Stations	DOCKET FILE COPY ORIGINA	
Parker and Port St. Joe, Florida)	
TO: Chief, Allocations Branch Policy and Rules Division		

COMMENTS IN SUPPORT OF NOTICE OF PROPOSED RULE MAKING

SOUTHERN BROADCASTING COMPANIES, INC.

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May 11, 1995

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SUMMARY

Southern Broadcasting Companies, Inc. ("SBC"), hereby submits its comments in response to the Commission's Notice of Proposed Rulemaking ("NPRM") in this proceeding. Southern again demonstrates that its proposal to reallot Channel 233C from Port St. Joe, Florida, to Parker, Florida, complies with the Commission's rules and policies, and would serve the public interest.

While Parker is located within the so-called census designated Panama City
"Urbanized Area" SBC explains that the Urbanized Area designation was made solely on
population density and is not an indicator that Parker is dependent upon Panama City. To the
contrary, SBC provides extensive evidence that Parker is an <u>independent community</u> that does
not rely upon other communities for assistance, and that Parker should not be credited with
all the services licensed to communities located in the Urbanized Area.

Finally, at the Commission's request, Southern provides additional information concerning the public interest benefits that will accrue from reallotment of Channel 233C to Parker since no transmitter site move is proposed.

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TO: Chief, Allocations Branch Policy and Rules Division

COMMENTS IN SUPPORT OF NOTICE OF PROPOSED RULE MAKING

Southern Broadcasting Companies, Inc. ("SBC"), licensee of WPBH(FM), Port St.

Joe, Florida, by its attorneys, and pursuant to Section 1.415 of the Commission's Rules, hereby submits its Comments in support of the Notice of Proposed Rulemaking, DA 95-396, released March 20, 1995 ("NPRM"), in the above-captioned proceeding. In support whereof, the following is shown:

I. Background

1. In its Petition for Rulemaking ("Petition") filed on March 4, 1994, SBC requested that the Commission amend Section 73.202(b) of the Rules to (a) delete Channel 233C from Port St. Joe, Florida; (b) add Channel 233C to Parker, Florida; and (c) modify the license for WPBH(FM), Port St. Joe, Florida, to specify "Parker, Florida" as the station's city of license. SBC demonstrated that such a change would serve the public interest and would comply with §1.420(i) of the Commission's Rules and the Commission's policy concerning modification of a station's license to specify a new community of license. See, Modification of FM and TV Authorizations (New Community of License), 4 FCC Rcd 4870 [66 RR 2d]

877] (1989).

2. In response to the filing of SBC's Petition, the Commission issued its NPRM, seeking comment on SBC's proposal. While the NPRM noted that SBC's proposal complies with §1.420(i) rules and further noted the various public interest benefits that would result from a grant of SBC's proposal, the Commission concluded that "we are unable to determine whether petitioner's proposal would result in a preferential arrangement of allotments."

NPRM at ¶4. The Commission noted that Parker, Florida, is located within the U.S. Census designated Urbanized Area for Panama City, Florida, and questioned whether SBC's proposal to reallot channel 233C to Parker, Florida, "is deserving of a local service preference or whether Parker should be credited with all the aural services licensed to the Panama City Urbanized Area." Id. Finally, the Commission requested that SBC submit "additional information regarding the public interest benefits that would accrue from the reallotment of Channel 233C to Parker, Florida, since it propose no change in its transmitter site."

II. SBC'S Proposal Will Serve the Public Interest

3. The proposed reallotment of Channel 233C from Port St. Joe, Florida, to Parker, Florida, is permissible under Section 1.420(i) of the Rules, which authorizes the Commission to modify the license or permit of an FM station to specify a new community of license where the amended allotment would be mutually exclusive with the licensee's present allotment. Under the rule, two factors must be demonstrated in order to change a station's city of license in a rule making proceeding: (1) the channel changes must be mutually exclusive, and (2) the rule making must not deprive a community of an existing service representing its only local transmission service. SBC has met both factors. The proposals

for Port St. Joe and Parker are mutually exclusive. The Technical Exhibit included as Exhibit 1 to SBC's Petition shows that Port St. Joe presently has two commercial broadcast stations, WMTO(FM), and WPBH.¹ Therefore, reallotment of Channel 233C to Parker would not deprive Port St. Joe of its only local transmission service.

4. The Commission has stated that in making the determination of whether to permit a modification of a station's community of license, it would "take into account the totality of the service improvements resulting from a proposed change in community of license in determining whether an allotment proposal should be approved." See Modification of FM and TV Authorizations (New Community of License), 4 FCC Rcd 4870 [66 RR 2d 877] (1989). SBC's proposal will continue to provide regional service to Port St. Joe, while providing first aural service to Parker. The Commission's priorities for assigning FM allotments are set out in Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88, 92 [51 RR 2d 807] (1982). They are: (1) first aural service, (2) second aural service, (3) first local service, and (4) other public interest matters. Co-equal weight is given to priorities (2) and (3). Here, the provision of first local service to Parker is preferred to second local service to Port St. Joe. Thus, SBC has demonstrated that the service improvements that will result from its proposal weigh in favor of granting its requested changes.

III. SBC's Proposed Reallotment of Channel 233C to Parker Deserves A First Local Service Preference

5. In its <u>NPRM</u>, the Commission noted that Parker, Florida, is located within the U.S. Census Bureau's designated "Urbanized Area" of Panama City, Florida. As such,

¹ The license for WJOE(AM), Port St. Joe, Florida, was surrendered for cancellation November 30, 1992.

Commission policy requires SBC to demonstrate that Parker is a separate and independent community apart from Panama City; otherwise, the Commission will treat the so-called Panama City "metropolitan area" as one community and credit Parker with all of the aural services for the Panama City Urbanized Area, thus denying SBC's claim to a first service preference in this case. See, Faye & Richard Tuck, 3 FCC Rcd 5374, 65 RR 2d 402, 407 (1988). However, as is demonstrated herein, the inclusion of the community of Parker in a generic Census Bureau population grouping should not be an impediment to the Commission granting a first local service preference in this case.

- 6. Ordinarily, the Commission presumes that every community needs at least one local transmission service. Id. However, in the case of a community located in an "Urbanized Area" that is interdependent on a nearby central city, the Commission presumes that the community's need for local self-expression will be met by the broadcast stations licensed to the nearby central city. Id. This case does not involve the classic "central city, nearby dependent community" scenario. In fact, the overwhelming evidence in this case suggests just the opposite; namely, that Parker, Florida, is a separate, independent city that has no ties to Panama City that would justify Parker being credited with all the signals located in the census grouping. Many of the cities neighboring Panama City are self-governing, independent communities. That Parker may have been grouped with Panama City by the Census Bureau in an "Urbanized Area" is truly a meaningless designation so far as the Commission's determination of whether SBC's proposal would provide a first local service to Parker.
 - 7. The Census Bureau's method of designating "Urbanized Areas" is based solely on

an objective numerical standard and one that does not take into account interdependence between the central city and the communities included in that city's Urbanized Area. The fact that a community is placed in an Urbanized Area says very little, if anything, about that community's relationship to the nearby central city and is not an appropriate test to determine a first local service preference in this case.

8. The Census Bureau's method for designating Urbanized Area is based solely on population density. An Urbanized Area is specifically defined as a "separation of urban and rural population in the vicinity of the larger cities." Comparative Preferences Within Metropolitan Areas, 48 FR 19428, April 29, 1983. The Census Bureau identifies certain locations or cities with a minimum population of at least 50,000 and with densely populated surrounding territory. See, Urbanized Areas for the 1990 Census - Final Criteria, 55 FR 42592, October 20, 1990. Once a central city is located, the Bureau then calculates the boundaries of the Urbanized Area by simply measuring the density of the surrounding population. Any contiguous area with a population density of at least 1,000 people per square mile is included in the Urbanized Area. Areas with populations below the 1,000 people per square mile benchmark are excluded. No consideration whatsoever is given to the economic or social relationship between the central city and the other communities included in its Urbanized Area. Therefore, a community with no ties whatsoever to the central city often is included in the so-called "central city's" Urbanized Area. The determination is based solely on the numerical population factor.

² Copy attached for the reader's convenience at Exhibit 6.

³ Copy attached for the reader's convenience at Exhibit 7.

9. Given these facts, the Commission should not place so much emphasis on the fact that Parker is included in the Panama City "Urbanized Area." There is overwhelming evidence to demonstrate that Parker is a completely independent city. Even the Census Bureau itself has cautioned other agencies utilizing the "Urbanized Area" designation as a factor in decision making to "ensure that the results are appropriate for such use." <u>Urbanized</u> Areas for the 1990 Census, supra. The Bureau has stated that: "[B]ecause the Census Bureau tabulates data for urbanized areas solely for the purposes of statistical presentation and comparison, it does not take into account or attempt to anticipate any nonstatistical uses that may be made of these areas or their associated data, nor does it attempt to meet the requirements of any such nonstatistical program uses." Id. In this case, the Commission has failed to take into account the fact that Parker was included in the Panama City Urbanized Area merely because of population density. Thus, it is not appropriate for the Commission to base its decision whether to grant a first local service preference to SBC's proposal to serve Parker solely on the Census Bureau's Urbanized Area designation. SBC has clearly shown that Parker is an independent city, that its inclusion in the Panama City, Urbanized Area was a meaningless designation, and that a first service preference is warranted in this case.

IV. The Evidence Conclusively Demonstrates That Parker Is An Independent Community

10. In its Petition For Rulemaking, SBC included an extensive amount of evidence to document the fact that Parker is a independent city. This evidence satisfies the Commission's tests for evaluating a community's independence from a nearby central city. The Commission has stated that, when evaluating independence, it will consider: (a) population coverage to both the proposed suburban community and adjacent central city; (b) size of the suburban

community versus the size of the central city; and, most importantly, (c) the interdependence of the suburban community to the central city. See, Faye & Richard Tuck, supra. Under each of these factors, the facts show that Parker is independent from Panama City.

A. Service To Parker Versus Service To Panama City

11. In the Technical Exhibit included as Exhibit 1 to its Petition, SBC showed that the entire city limits of Parker. Florida, will be served by the principal community contour (3.16 m/Vm) of WPBH. Only a very small portion of Panama City, Florida, will be served by WPBH's principal community contour. Therefore, with the allotment of Channel 233C to Parker, WPBH would very clearly be serving the city of Parker in this case and not the community of Panama City.

B. Population of Parker Versus Panama City

12. Under the second variable, the population of Panama City is 34,378.⁴ The population of Parker has expanded to 4,598.⁵ Moreover, Parker is non-contiguous to Panama City and is physically separated by two other communities - Springfield and Callaway, Florida. The City of Parker, located in the Southeastern area of Bay County, Florida, actually pre-dates the founding of the six other communities of Panama City, Lynn Haven, Springfield, Millville, Panama City Beach and Callaway are located in Bay County.

⁴ Population figure from 1990 census.

⁵ Population figure from 1990 census. It should be noted that the Commission has made allotments to communities with much smaller populations than Parker's. <u>See</u>, <u>Amendment of FM Table of Allotments (Princeville, HI)</u>, 5 FCC Rcd 590 (N.M.B. 1990)(population 500); <u>Amendment of FM Table of Allotments (Semora, NC)</u>, 67 RR 2d 610 (1990)(population 150); <u>Amendment of FM Table of Allotments (Evans, GA)</u>, 4 FCC Rcd 7926 (M.M.B. 1989)(population 800); <u>Amendment of FM Table of Allotments (Virgie, KY)</u>, 4 FCC Rcd 7475 (M.M.B. 1989)(population 800).

Parker was created in 1835, took its present name in 1887 and was incorporated in 1967. <u>Id</u>. Panama City was not created until 1909. <u>Id</u>. Therefore, Parker is not a "bedroom" suburb of Panama City and is a separate independent Florida community.

C. Parker's Independence From Panama City

- 13. The most important of the Commission's criteria is whether the suburban community is interdependent with another nearby city. In assessing interdependence, the Commission considers the following factors:
 - 1. The extent to which community residents work in the larger metropolitan area, rather than the specified community;
 - 2. Whether the smaller community has its own newspaper or other media that cover the community's local needs and interests;
 - 3. Whether community leaders and residents perceive the specified community as being an integral party of, or separate from, the larger metropolitan area;
 - 4. Whether the specified community has its own local government and elected officials;
 - 5. Whether the smaller community has its own telephone book provided by the local telephone company or zip code;
 - 6. Whether the community has its own commercial establishments, health facilities, and transportation systems;
 - 7. The extent to which the specified community and the central city are part of the same advertising markets;
 - 8. The extent to which the specified community relies on the larger metropolitan area for various municipal services such as police, fire protection, schools and libraries.

Fave and Richard Tuck, 65 RR 2d at 409.

1. Workplace Employment

14. Under the factor of workplace employment, Parker is home to more than 500 businesses, restaurants, shopping centers and professional offices. See Exhibit 1. In addition, employment in Parker is derived by Tyndall Air Force Base and Stone Container (a paper mill). Therefore, unlike a "bedroom" type community where the residents leave the community each day and commute to work at businesses located in a nearby central city, Parker has its own employment base which attracts workers from the area.

2. Other Media Outlets

15. While Channel 233C would be occupied by the first broadcast station allotted to Parker, many of the other communities located in the Panama City Urbanized Area have successfully demonstrated their independence to the Commission and have had FM stations allotted to them. For example, the communities of Callaway, Mexico Beach, Panama City Beach, Springfield, and Bonifay, Florida, are all located in the Panama City Urbanized Area and all have FM stations licensed to each community. Many of these communities do not even possess the extensive local businesses and municipal services that are present in Parker and yet the Commission was able to determine that they were worthy of their own local service. For example, Mexico Beach is an unincorporated community and yet it has its own FM station, WEBZ(FM). Like other neighboring communities in the Panama City Urbanized Area, Parker is an independent community that deserves its own media voice.

These stations include: WAKT(FM), Panama City Beach, Florida; WDRK(FM), Callaway, Florida; WEBZ(FM), Mexico Beach, Florida; WYOO(FM), Springfield, Florida; WPCF-FM, Panama City Beach, Florida; WRBA(FM), Springfield, Florida; and WTBB(FM), Bonifay, Florida.

3. Perceptions of Community Leaders

16. SBC has already submitted strong evidence that Parker is an independent community. The city is fiercely independent from other nearby communities, does not consider itself to be aligned with Panama City, and has fought efforts to consolidated municipal services with other communities. Included as Exhibit 1 to these Comments is a copy of a letter dated December 30, 1993, of Brenda Hendricks, the Mayor of Parker. Ms. Hendricks states that: "The City of Parker did not come about due to the 'urban sprawl of Panama City' and Parker is no way dependent upon the City of Panama City." Exhibit 1. These thoughts are reinforced by the Mayor of Panama City, Girard L. Clemons, Jr., who has stated: "... the City of Parker is not part of Metropolitan Panama City or of the urban sprawl of Panama City. Furthermore, Panama City provides no municipal services to the City of Parker is a wholly functioning independent city." Exhibit 2.

17. This perception of independence is shared by each of the other cities in Bay County, Florida. Each city considers itself to be completely independent of Panama City. See Exhibit 3 (Copies of letters from the mayors of other Bay County cities). The rejection of recent attempts to consolidate the local municipal services of these cities is further proof of how fiercely independent these communities have become. As noted in SBC's Petition, the Bay County Charter Study Committee investigated the possibility of all six cities consolidating municipal services (fire, police, water, sewer, etc.) into a single "county-wide" service for cost-saving purposes. See Exhibit 4. Twice, in 1986 and more recently in 1992, this idea was flatly rejected by the citizens of these cities. The citizens of these cities, including

A copy of this letter was also filed with the Petition.

Parker, clearly value their independence and obviously do not view themselves as an integral part of any other city, especially Panama City.

4. Local Government and Elected Officials

18. The City of Parker has its own local government, which as previously noted, provides numerous municipal services to its citizens. See Exhibit 1. The City has its own full-time Mayor, elected City Commission and paid City Clerk. <u>Id</u>.

5. Telephone Book and Zip Code

19. While the telephone listings for Parker, are included in the Panama City-Bay County area telephone book, the phone listings for the City of Parker are listed separately.

See Exhibit 5. In addition, Parker has a zip code ("32404") separate from Panama City's zip code.

6. Commercial Establishments, Health Facilities and Transportation

20. As previously noted, Parker is home to more than 500 hundred businesses, many of which bear the name "Parker" in their names. See Exhibits 1 and 5. Parker has its own churches, civic organizations, shopping centers, library and is in the process of constructing a major athletic facility. <u>Id</u>. Parker is a thriving community which continues to improve upon services and enhance its community. <u>Id</u>.

7. Advertising Markets

21. Parker is included in the Panama City Metro Market by Arbitron, but all residents of Bay County are considered part of this market. The Commission has allotted several other FM stations to communities located in this market and in so doing, must have recognized that each of the communities represents its own advertising market. This would

certainly be the case with Parker, which has enough local businesses to support its own advertising revenue and to be classified as a separate advertising market.

8. Municipal Services

- 22. Parker has its own full-time Fire Chief, Police Department, Parks Department, Street Department, Library and provides its citizens with water and sewer services through a franchise with Bay County. See Exhibit 1. Therefore, Parker does not depend upon Panama City for any services it provides to its citizens. This is the case with many of the other cities that comprise Bay County. In each case, the city provides its own municipal services and does not look to Panama City for assistance.
- 23. As the totality of evidence clearly shows, Parker has developed the type of socioeconomic characteristics of a separate city that serves its citizens without reliance on outside communities. Parker is not a "bedroom" community of Panama City and never has been. Parker is a thriving Florida city which deserves its own local broadcast station. The Commission should recognize this fact and grant SBC a first local service preference for its proposal to reallot Channel 233C to Parker.

V. Additional Public Interest Considerations

- 24. In its <u>NPRM</u>, the Commission requested SBC to submit additional information concerning the public interest benefits that would accrue from the reallotment of Channel 233C to Parker, since no change in transmitter site is proposed. <u>NPRM</u> at ¶4. As was fully demonstrated in SBC's Petition, the public interest is will be greatly served by the reallotment of Channel 233C to Parker.
 - 25. By reallotting Channel 233C to Parker, the Commission will be bringing first

local service this community. The Commission has recognized that first local service is among the highest of priorities in making allotments of Commission spectrum. See, Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88, 92 [51 RR 2d 807] (1982). By reallotting Channel 233C to Parker, the Commission will enable SBC focus its attention on the local problems, issues and needs of Parker, Florida, and provide programming to meet such needs, while at the same continuing to provide service to the residents of Port St. Joe, Florida. In effect, Parker will be gaining a first local service at no cost in reception to the citizens of Port St. Joe which will continue to receive local service from WMTO as well as regional service from WPBH. Such public interest benefits weigh in favor of granting SBC's proposed changes.

VI. Conclusion

26. SBC has clearly demonstrated that Parker, Florida, is a community that deserves its first local aural service. By allotting Channel 233C to Parker, the Commission will be placing Parker on an even par with the other communities in Bay County that have their own FM stations. In addition, SBC's proposal will bring first service to Parker with no loss of reception service to the community of Port St. Joe. SBC has shown that the fact that Parker was included in the Panama City "Urbanized Area" is a meaningless designation made solely on the basis of population density. Parker is independent of Panama City, and is a community that prides itself on its independence. The Commission should recognize Parker, Florida, as a separate community and allot the city its first FM station channel.

WHEREFORE, SBC respectfully requests that the Commission grant its Petition For Rulemaking and amend Section 73.202(b) of its Rules, as follows:

Florida

	Present	Proposed
Port. St. Joe	228C2, 233C	228C2
Parker		233C

SBC also requests the Commission to modify the license of WPBH to operate on FM Channel 233C at Parker, Florida. Upon allotment of Channel 233C to Parker and the allotment becoming effective, SBC will promptly file with the FCC an application for construction permit or license, as directed, to modify WPBH's license to operate as a Parker station and will take those steps necessary to operate WPBH on Channel 233C at Parker.

Respectfully submitted,

SOUTHERN BROADCASTING COMPANIES, INC.

C--- C C

By:

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Its Attorneys

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1990 M Street, N.W. Suite 510 Washington, D.C. 20036 (202) 785-2800

May 11, 1995

EXHIBIT 1

LETTER OF BRENDA HENDRICKS, MAYOR OF PARKER, FLORIDA



CITY OF PARKER

BRENDA HENDRICKS
MAYOR
WILMER JONES
COUNCILMAN
ROBERT LEE
COUNCILMAN
BO SECHREST
COUNCILMAN
LEONARD SMITH

COUNCILMAN

POST OFFICE BOX 10745
PARKER, FLORIDA 32404

December 30, 1993

Lyn Hindsman Vice President/General Manager Southern Broadcasting 1834 Lisenby Ave. Panama City, FL. 32405

Dear Mrs. Hindsman,

The City of Parker did not come about due to the "urban sprawl of Panama City" and Parker is no way dependent upon the City of Panama City.

Parker, an incorporated municipality, was organized in 1835 and is the oldest community in Bay County. We are physically separated from Panama City by two other incorporated municipalities, Springfield and Callaway.

The City consists of a mixture of residential properties and businesses, churches and long established civic organizations. Although the City is surrounded by two (2) bodies of water there are still undeveloped areas which may provide growth for both business and residential growth. The current population of our community is 4,598. The City employs a full-time Fire Chief, Police Department, Parks Department, Street Department, Library, and provides our residents with full water and sewer services through a franchise with Bay County.

We are a progressive City in the midst of constantly upgrading and improving services to enhance our community. At this point in time, we are ready to begin construction of a major athletic facility that will provide much needed services for other communities and organizations in Bay County.

Parker is a proud City. Our elected City Commission, fulltime Mayor and paid City Clerk work hard to provide for the needs of our citizens. Please be assured. We are not reliant upon the City of Panama City for any services for our citizens.

Sincerely,

City of Parker

Brenda G. Hendricks

Brendey Handrick

Mayor

EXHIBIT 2

LETTER OF MAYOR OF PANAMA CITY

CITY OF PANAMA CITY

GERRY CLEMONS

March 3, 1994

Lyn Hindsman
Vice President/General Manager
Caller Box 2288
Panama City, FL 32402

Dear Lyn;

The intent of this letter is to verify that the City of Parker is not a part of metropolitan Panama City or of the urban sprawl of Panama City. Furthermore, Panama City provides no municipal services to the City of Parker. Parker is a wholly functioning independent city.

If you need any further information, please give me a call.

Sincerely,

GLC/eps

EXHIBIT 3

LETTERS OF MAYORS OF CITIES IN BAY COUNTY

MAYOR Hubert L. Rodgers

COMMISSIONERS James Phillip Mayo James V. Sartain G. Thomas Lee Ray G. Boevink



CITY CLERK Judy S. Cumbest (904) 872-7780

FIRE DEPARTMENT Chief James D. Walls (904) 871-2753

PUBLIC WORKS DEPARTMENT Director Donald J. Minchew Phone (904) 871-1033 FAX (904) 871-2416

"NORTH FLORIDA'S FASTEST GROWING CITY"

5708 CHERRY STREET • CALLAWAY, FLORIDA 32404 PHONE: (904) 872-7780 SUNCOM: 777-7780 FAX: (904) 872-7789

January 3, 1994

Lynn Hindsman Vice President & General Manager WPAP Radio 1834 Lisenby Avenue Panama City, FL 32405

Dear Mrs. Hindsman:

Per your request, I am writing to let you know that the City of Callaway is indeed a completely separate municipality from Panama City. The City of Callaway has its own municipal services such as water, sewer, Fire Department, City Hall, and Public Works Departments. We do not rely upon the City of Panama City for anything related to running the City of Callaway.

Should you need additional information, please give me a call.

Sincerely,

Tubert L. Rodgers

Mayor

/rtt

CITY OF SPRINGFIELD

"IN BAY COUNTY, FLORIDA"

Charles "Jerre" Deason, MAYOR

COMMISSIONERS: Irene Henderson Bowen Henry J. Brooks M. J. "Jimmy" Whaley Donahue Ziglar



PHONE (904) 785-9516

DRAWER 3717

3529 EAST 3rd STREET (HWY. 22).
SPRINGFIELD, FLORIDA 32401

December 29, 1993

To Whom It May Concern:

The City of Springfield is not a result of urban sprawl within a metropolitan area as one might think today. The City of Springfield was originally founded as a village, during the construction of the paper mill, in Bay County during the thirties. Most of the early citizens owed their livelihood to the mill. In the late forties and early fifties a drive was iniated to incorporate the village into a city. The incorporation was completed in the year of 1953.

During the late fifties and early sixties, Springfield was the second largest City within Bay County. We are a full service City. We offer all basic services ie: water, sewer, etc. We are very proud of our fulltime professional fire department and police department. We are one of only a few cities that offer our citizens a second choice in cable TV by operating a municipal cable system.

We are a progressive city that will continue to operate and grow well into the twenty first century. We are financially sound with no major indebtedness to hamper our growth. The City has a population of 8,900 as of the past census. The citizens of Springfield are primarily of the lower to middle income working class and are very proud of their heritage.

Sincerely,

đerre Deason

Mayor